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October 17, 2024

VIA ECF

Honorable Joseph A. Marutollo.
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Government Employees Ins. Co. et al. v. Vladislav Stoyanovsky et al.
Docket No.: 1:24-cv-01017-PKC-JAM**

Dear Judge Marutollo:

As the Court is aware, we represent Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company, and GEICO Casualty Co. (collectively "Plaintiffs" or "GEICO") in the above-referenced matter. Plaintiffs submit this letter, together with Defendants Headlam Medical Professional Corporation ("HMPC"), Vladislav Stoyanovsky ("Stoyanovsky"), Dilsod Islamov ("Islamov"), Dmitriy Khavko ("Khavko"), Kianan Tariverdiev ("K. Tariverdiev"), and Nazim Tariverdiev ("N. Tariverdiev") (collectively, the "Appearing Defendants") to provide the Court with an update regarding the status of this action. See Dkt. Order Dtd. Sept. 13, 2024.

As the Court is aware, Plaintiffs' filed an Amended Complaint on August 26, 2024. With the exception of Defendants Eric Meladze and Gary Grody, all of the other defendants have been served and either have appeared or are in default. See D.E. 37, 52. All of the appearing defendants have filed Answers to the Amended Complaint. See D.E. 45, 46, 53. With respect to Defendants Gary Grody also known as Lance Grody and Eric Meladze, Plaintiffs served each in accordance with the Court's October 8, 2024 order and will be filing corresponding affidavits of service in the next few days. Additionally, Plaintiffs will be requesting certificates of default against Defendants Sunstone Services Inc. and Blue Tech Supplies Inc. in accordance with Local Rule 55.1 in the next several days. D.E. 49-50.

Plaintiffs and the Appearing Defendants have resumed discovery, and have served Amended Rule 26(a) disclosures. The newly appearing defendants have also served their Rule 26(a) disclosures. Plaintiffs and the Appearing Defendants will continue to diligently proceed with fact discovery,

however, neither Plaintiffs nor the Appearing Defendants expect to be able to complete fact discovery by the November 25, 2024, deadline. The Parties will be moving to extend fact discovery as we get closer to the November 25th date and can better anticipate how much additional time is needed.

We thank the Court for its attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ Michael Vanunu

Michael Vanunu

cc: All counsel via ECF